



State of Utah

DEPARTMENT OF ENVIRONMENTAL QUALITY DIVISION OF SOLID AND HAZARDOUS WASTE

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Governor

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January 11, 2001

Mr. Ron Ryan
SF Phosphates
9401 North Highway 191
Vernal, Utah 84078

Dear Mr. Ryan:

SUBJECT: SF Phosphates Class IIIb Landfill Application
Request for more information.

Included is a review of the permit application for the operation of the Class IIIb Landfill. Review of this permit application indicated that there are some items that require additional documentation. Specifically, the permit application indicated that the bonding under the DOGM permit was going to be modified to include the financial assurance for the Class IIIb Landfill. Please submit a copy of this modified bond demonstrating that this change has been made.

As soon as we receive this information, the Division will prepare a Draft Permit for this facility and prepare this information for public notification and comment. If you have any questions regarding this letter, please contact Roy Van Os or Ralph Bohn at (801) 538-6170.

Sincerely,


Dennis R. Downs, Executive Secretary
Utah Solid and Hazardous Waste Control Board

DRD/RVO/kk

Enclosure

c: Ted Allen, DEQ, District Engineer
Joseph B. Shaffer, TriCounty Health Dept.
SF Phosphates File

Path: F:\SHWSPB\RVANOS\WP\SF Phosphates\010104 SF Phosphates NOD.doc

M/047/007

TOW
Copy of response
cover letter

RECEIVED
JAN 22 2001
DIVISION OF
SOLID AND HAZARDOUS WASTE

CLOSURE PLAN

Closure Schedule

Closure of the SF Phosphates landfill facility will commence after the landfill area is full. The estimated time to closure is approximately 20 years. Closure procedures will begin within 30 days after covering the final volume of waste.

Design of Final Cover

When the operational life of the landfill facility has ended, final cover will be accomplished using fill from the adjacent borrow area. This final cover will be at least two feet deep and will be graded to match the surrounding topography (see Cross-sections A-A' and B-B' in Appendix A). Seeding with species adapted to the environmental conditions will then be used to revegetate the area.

Capacity of Site

The volume of the SF landfill site is approximately 129,782 yd³. It is estimated that 20 percent of this volume (25,956 yd³) will be comprised of waste with the remaining 80 percent as fill material (103,826 yd³). The current fill strip is being filled at a rate of 175 yd³ per month and has 9,333 yd³ remaining space. At the current rate of fill, the fill strip has a remaining life of approximately 7.8 years.

Final Inspection by Regulatory Agencies

Upon closure of the SF landfill, a final inspection by the Division of Solid and Hazardous Waste will take place to approve the final cover and release the site for closure. The Division of Oil, Gas, and Mining (DOGM) will also perform a subsequent inspection in order to release the landfill facility from the reclamation bond, which covers all disturbed land on the mine site. This inspection will examine soil and slope stability, drainage, and vegetation success.

POST-CLOSURE PLAN

Site Monitoring

Post-closure monitoring of the landfill site will be conducted periodically for several years following closure. The site will be monitored to insure slope and erosional stability. Run-on/run-off structures will also be inspected to insure proper functioning and stability. As required by DOGM regulations regarding reclamation, inspection of vegetative success will be performed for at least 3 years following reclamation. After the third year, success of revegetation will be determined.

Changes to Record of Title, Land Use, and Zoning Restrictions

The title to the property on which the SF landfill sits is held by SF Phosphates. It is estimated that SF property contains 100 years of minable reserves. Therefore, operations at the SF mining facility are projected well into the future and no near changes to title, land use, or zoning is expected.

Maintenance to Maintain Cover and Run-on/Run-off Control Systems

Periodic inspections of the landfill site will be made to monitor site stability and revegetation progress. If upon inspection, any of the water bars or retention pools show signs of damage or failure, equipment will immediately be brought in to repair or rebuild the structures as needed. In addition, if inspection reveals areas where vegetation has not established, these areas will be reseeded and/or mulched to assure plant growth.

Post-Closure Contact Information

The following individual should be contacted about the landfill facility during the post-closure care period:

Ron Ryan
9401 North Highway 191
Vernal, Utah 84078
Tel. 435-781-3348

FINANCIAL ASSURANCE

Closure Costs and Calculations

Closure cost for the SF landfill would include construction of run-on/run-off structures, final grading, ripping of cover surface for seeding, and seeding. Landfill closure costs are very similar to the costs incurred in many other reclamation efforts on the mine facility. Based on costs from previous reclamation efforts, landfill closure costs are estimated as follows:

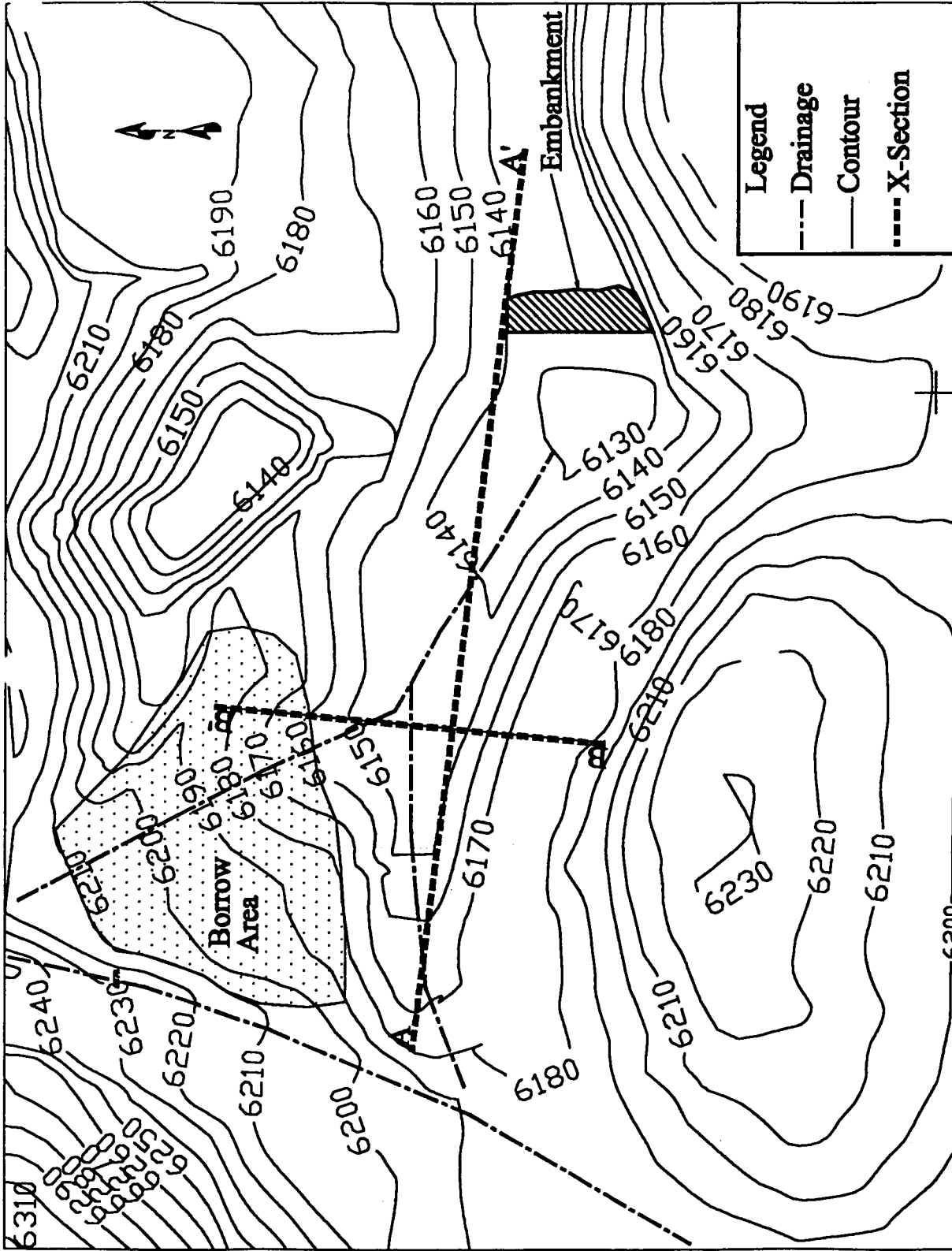
$$7.5 \text{ total final cover acres} \times \$3,000 \text{ per acre} = \$22,500 \text{ total closure cost}$$

Post-Closure Costs and Calculations

Inspection costs are the only expected post-closure cost. Other post closure cost may include possible minor repair of run-on/run-off structures and reseeding of any areas where initial seeding resulted in poor revegetative success. Cost of these types of repair activities would be extremely low.

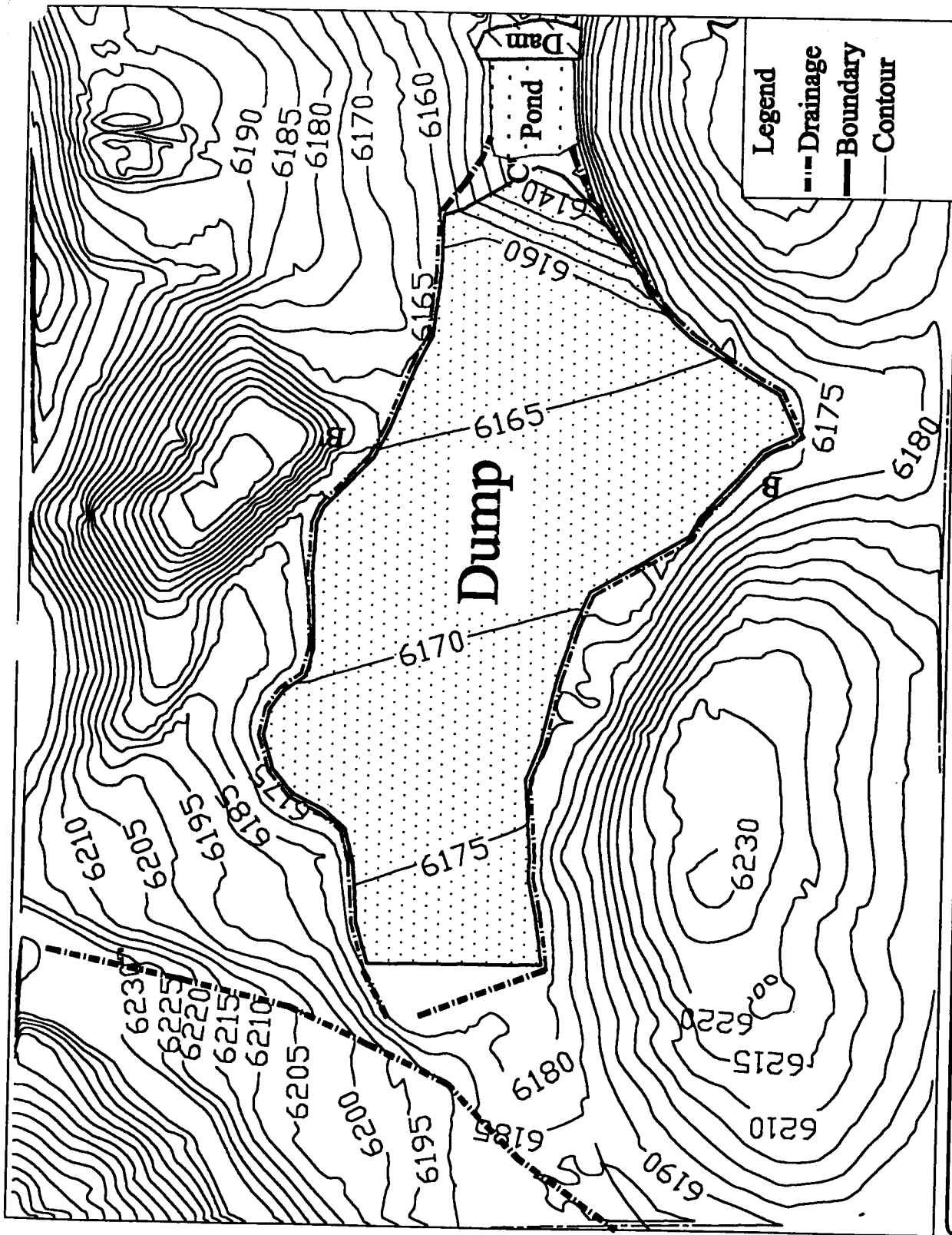
Financial Assurance Mechanism and Effective Date

A mining reclamation bond of \$2.2 million held by DOGM currently exists for the SF mine site, including the landfill facility. SF proposes that this bond cover the financial assurance mechanism required under R315-309. This bond amount more than exceeds any closure or post-closure cost for the landfill facility. This bond will be revised in the year 2000.



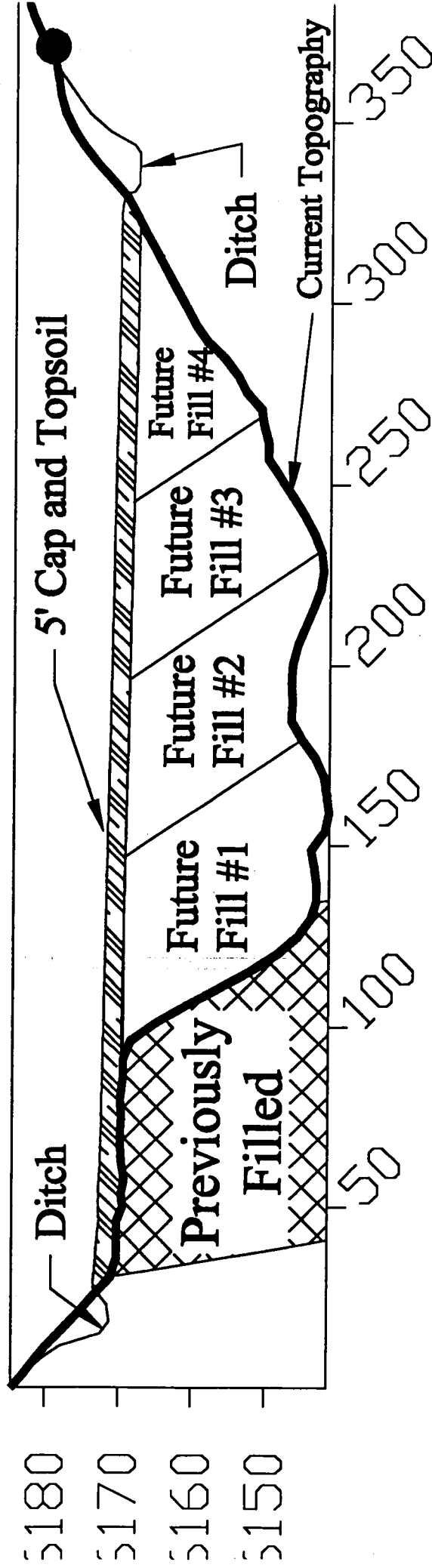
Dump Location
with current contours
1"=150'

SF Phosphates L.C.
A Utah Limited Liability Company
VERNAL, UT

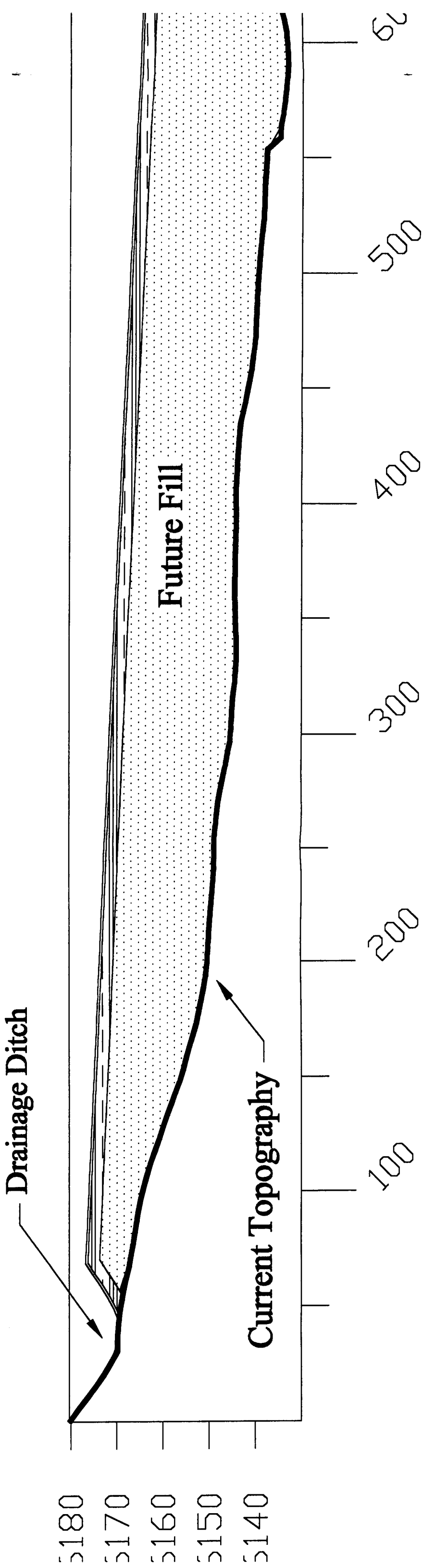


Dump X-Section Section B-B'

Horizontal Scale 1"=40'
Vertical Scale 1"=20'



Dump X-Section Section A-A'



Dump X-Section Section A-A'

Horizontal Scale 1"=40'
Vertical Scale 1"=20'

